

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

SONY MUSIC ENTERTAINMENT, *et al.*,

Plaintiffs,

v.

COX COMMUNICATIONS, INC., *et al.*,

Defendants.

Case No. 1:18-cv-00950-LO-JFA

**DECLARATION OF JEFFREY M. GOULD**  
**IN SUPPORT OF PLAINTIFFS' MOTION TO PRECLUDE CERTAIN EXPERT**  
**TESTIMONY BY W. CHRISTOPHER BAKEWELL**

I, Jeffrey M. Gould, hereby declare:


1. I am Senior Counsel Oppenheim + Zebak, LLP, and am admitted to practice law in the District of Columbia, among other jurisdictions. I am counsel for Plaintiffs in the above-captioned case. I have personal knowledge of all facts stated in this declaration, and if called upon as a witness, I could and would competently testify thereto.

2. I submit this declaration in support of Plaintiffs' Motion to Preclude Certain Expert Testimony By W. Christopher Bakewell filed contemporaneously herewith.

3. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of the Rebuttal Expert Report of W. Christopher Bakewell Regarding Damages, May 15, 2019.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 30, 2019 in Washington, District of Columbia.



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Jeffrey M. Gould  
Counsel for Plaintiffs